

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
) CRIMINAL NO. 04-10192-NG
v.)
)
CARLOS RUBEN RIVERA)

**SECOND MOTION FOR EXTENSION OF TIME WITHIN WHICH TO FILE
GOVERNMENT'S RESPONSE TO DEFENDANT'S SENTENCING MEMORANDUM**

The government respectfully moves for a second extension of time until August 19, 2005, within which to file any response to the defendant's sentencing memorandum, which was filed on or about July 5, 2005. [See Dkt #31]. The government had previously sought and received an extension from the applicable time requirements, until August 12, 2005 to file its response.

As grounds therefor, the government states the following:

1. The defendant pled guilty on July 28, 2005, and sentencing has been scheduled for September 14, 2005.
2. The government needs the additional time due to a heavy workload and other more immediate pressing matters requiring the undersigned's attention.
3. There will be no harm or detriment to the defendant if the within motion is granted.

WHEREFORE, the government respectfully requests that the Court grant it **until August 19, 2005** to file any response to the

defendant's sentencing memorandum.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:

/s/Antoinette E.M. Leoney
ANTOINETTE E.M. LEONEY
Assistant U.S. Attorney
(617) 748-3100

Date: August 12, 2005

CERTIFICATE OF SERVICE

Suffolk, ss.

Boston, Massachusetts
August 12, 2005

I, Antoinette E.M. Leoney, Assistant U.S. Attorney, certify that I caused a copy of the foregoing to be served by electronic notice and by hand to Timothy Watkins, Esq., Federal Defender's Office, the counsel of record.

/s/Antoinette E.M. Leoney
ANTOINETTE E.M. LEONEY
Assistant U.S. Attorney